



**RE: 90 day accumulation extension request**   
Edwin Buckner to: Jon Thorstenson

06/01/2011 10:43 AM

Is there a risk of tipping? Can you apply an engineering control to prevent tipping such as a chain or tie-down? If the container is protected from tipping, a lid on the funnel that will keep vapors from escaping would be sufficient. Screwing the bung into the hole only hand tight is sufficient for closure during satellite accumulation. Of course, once the container is full, you will want to tighten the bung.

We would rather you had a funnel with a lid on the drum than spill material on the outside of the drum because there was no funnel.

Regarding the vent bung hole, it needs to be closed at all times except when adding/removing hazardous waste. Keeping the bung screwed into the hole or fixing a carbon vent or valve in the hole would serve that purpose.

Here is the EPA guidance document on the matter.

<http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/ae4702efe2c2d67a852576d50062ad7c!OpenDocument>

Just as a reminder, this guidance document is valid without changes only in Alaska and Iowa. State guidance in the other 48 states, if more stringent, controls interpretation.

Edwin G. Buckner, PE  
EPA Region 7  
Waste Enforcement and Materials Management Branch  
901 N. 5th St.  
Kansas City, KS 66101  
913-551-7621 ><>

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RCRA

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Jon Thorstenson

The funnels that we use do not have a strong sp...

06/01/2011 09:57:54 AM

From: Jon Thorstenson <jthorstenson@norplex-micarta.com>  
To: Edwin Buckner/R7/USEPA/US@EPA  
Date: 06/01/2011 09:57 AM  
Subject: RE: 90 day accumulation extension request

The funnels that we use do not have a strong spring to keep it closed. The weight of the lid keeps it closed. Even if it had a spring, would it truly survive the "tip-test"? I was under the impression that it had to be able to contain the waste if the barrel was knocked over. What would you suggest for the vent bung? Would you use a ball-valve there as well? I tell the operators that as long as it is lightly screwed in (if screwed in all the way it makes adding waste resin difficult) that it is okay. The vent bung is tighten all the way once the barrel is full.

-----Original Message-----

From: Buckner.Edwin@epamail.epa.gov [mailto:Buckner.Edwin@epamail.epa.gov]  
Sent: Tuesday, May 24, 2011 4:43 PM  
To: Jon Thorstenson  
Subject: RE: 90 day accumulation extension request

As long as the funnel serves the same purpose as a bung, it may remain in the bung hole. Typically that means the funnel lid will trap solvent

vapors and it either latches or has a strong enough spring to keep it closed if it turned over. I have seen some facilities install a ball valve between the funnel and the drum, but that isn't a necessity if the funnel lid functions adequately.

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Kansas City, KS 66101  
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Fide Surgimus ad Spem

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|Jon Thorstenson <jthorstenson@norplex-micarta.com>  
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| To: |  
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|Edwin Buckner/R7/USEPA/US@EPA  
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Would a barrel funnel be okay to leave on a waste drum as long as we keep the lid closed (see attached)? In other words, when we aren't adding waste couldn't we just shut the lid to the funnel or does the funnel have to be removed?

Some waste materials are set to a waste still for solvent recovery. Instead of labeling these drums as "hazardous waste" I have been labeling them as "In Process Material" and not applying waste labels/placards until the material is run through the still. The still bottoms are then handled as hazardous waste. My thought is that the material isn't waste since it still can be processed somewhere (still). As far as I know, this is okay in terms of federal rules but not okay with state rules. State rules either meet or exceed federal. That is why I was thinking this would be a state of Iowa question.

Let me know if any of this is unclear.

-----Original Message-----

From: Buckner.Edwin@epamail.epa.gov [mailto:Buckner.Edwin@epamail.epa.gov]  
Sent: Tuesday, May 24, 2011 3:26 PM  
To: Jon Thorstenson  
Subject: RE: 90 day accumulation extension request

I can answer an Iowa hazardous waste question. If it is a solid waste question, I would refer you to Theresa Steiner or Sue Johnson at IDNR.

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901 N. 5th St.  
Kansas City, KS 66101  
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|Jon Thorstenson <jthorstenson@norplex-micarta.com>  
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|Edwin Buckner/R7/USEPA/US@EPA

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|RE: 90 day accumulation extension request

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The waste is water pumped out of a well next to old underground storage tanks. This is a remediation effort.

UN1993, Waste Flammable Liquids, n.o.s. (Methanol, MEK), 3, PGII

EPA waste codes: D001, D007, D008, F003 & F005

I have a seperate state of Iowa specific RCRA question. Who would be the appropriate person to field a question?

-----Original Message-----

From: Buckner.Edwin@epamail.epa.gov [

mailto:Buckner.Edwin@epamail.epa.gov]

Sent: Tuesday, May 24, 2011 1:33 PM

To: Jon Thorstenson

Subject: Re: 90 day accumulation extension request

Shouldn't be a problem. What are the applicable waste codes? Where did the waste come from?

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901 N. 5th St.  
Kansas City, KS 66101  
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Fide Surgimus ad Spem

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|Jon Thorstenson <jthorstenson@norplex-micarta.com>  
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| To: |  
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|Edwin Buckner/R7/USEPA/US@EPA  
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| 90 day accumulation extension request

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Edwin,

I have a remediated waste water that is approaching the 90 day accumulation limit on June 2nd and I'm having trouble scheduling a removal. The earliest I can get it shipped out is June 6th. Can we get an extension on this waste water? Thanks for your time.

Facility information:  
Industrial Laminates / Norplex Inc.  
665 Lybrand Street  
PO Box 977  
Postville, IA 52162  
RCRA ID#: IAD073489288

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Manufacturing Engineer  
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[attachment "IMG\_0756.jpg" deleted by Edwin Buckner/R7/USEPA/US]